

The Honorable David E. Estudillo

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DR. MY NGUYEN,

Plaintiff,

v.

DENIS MCDONOUGH, Secretary, United
States Department of Veterans Affairs,

Defendant.

Case No. 3:23-cv-05790-DGE

STIPULATED MOTION AND ORDER TO
MODIFY SCHEDULING ORDER

Noted for Consideration:
December 13, 2024

JOINT STIPULATION

The parties hereby jointly STIPULATE AND AGREE to modify the scheduling order in the Court's April 19, 2024, Order Setting Jury Trial and Pretrial Dates (Dkt. 16), as set forth below.

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
All motions related to discovery must be filed by	December 13, 2024	January 3, 2025
Discovery completed by	December 18, 2024	January 8, 2025

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910,

912 (9th Cir. 1986). Good cause exists for extending the specific deadlines noted above. To date, the parties have completed or scheduled all depositions, served all written discovery, and exchanged hundreds of pages of responsive documents. The parties only need additional time for the limited purpose: to finish gathering, sorting, and sending responsive documents and information and to meet and confer regarding written discovery that has already been served. The parties agree not to conduct additional discovery beyond that described above and to extend the discovery-related motions deadline and discovery cutoff deadline solely to finalize the exchange of documents and information for outstanding discovery requests. The parties agree that this schedule modification need not impact the dispositive motions deadline or the current trial date.

For the reasons set forth above, the parties believe that there is good cause to modify the scheduling order and respectfully request that the Court grant their motion.

SO STIPULATED.

DATED this 13th day of December, 2024.

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I certify that this memorandum contains 252 words, in compliance with the Local Civil Rules.

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ORDER

It is hereby ORDERED that the parties' motion is GRANTED.

DATED this 23rd day of December, 2024.



David G. Estudillo
United States District Judge